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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/23/2021

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March 23, 2021

Via ECF

Hon. Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

**Re: *I.A.M. National Pension Fund et al. v. British Airways PLC*, No. 21-cv-1511
(VEC)**

Dear Judge Caproni:

This law firm represents Plaintiffs I.A.M. National Pension Fund and Board of Trustees of the I.A.M. National Pension Fund in the above-captioned matter. We write, with the consent of Defendant British Airways PLC, to request an adjournment of the Initial Pretrial Conference currently scheduled for April 9, 2021 at 10:30 a.m., as well as the joint letter currently due by April 1, 2021. There have been no previous requests for adjournment in this matter. All parties join in this request.

There is good cause to grant the requested adjournment. This is a collection action by a multi-employer pension fund against a contributing employer for amounts allegedly owed by the employer to the fund. The parties are currently in active discussions about the alleged debts at issue in this case and whether it is possible to resolve this matter through settlement. The parties wish to conserve judicial and other resources devoted to this litigation while those discussions are ongoing. British Airways executed a waiver of service, and its answer is presently due April 23, 2021.

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Accordingly, the parties respectfully request that the court adjourn the Initial Pretrial Conference for 60 days, to a date on or after June 8, 2021, and adjourn the joint letter deadline accordingly.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Joshua B. Shiffrin

Joshua B. Shiffrin

cc via email: Richard Mendles, General Counsel, Americas, British Airways PLC
(richard.mendles@ba.com)

Application GRANTED. The initial pretrial conference, currently scheduled for Friday, April 9, 2021, is hereby adjourned to **Friday, June 16, 2021, at 11:00 A.M.** Pre-conference submissions are due no later than **Thursday, June 8, 2021.** For the conference dial in information and a description of the pre-conference submissions, the parties should consult the Notice of Initial Pretrial Conference at docket entry 9.

SO ORDERED.



Date: March 23, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE